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Attorneys for Christina W. Lovato, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re

DOUBLE JUMP, INC.

Debtor.

Lead Case No.: BK-19-50102-gs
(Chapter 7)

Substantively consolidated with:

19-50130-gs	DC Solar Solutions, Inc.
19-50131-gs	DC Solar Distribution, Inc.
19-50135-gs	DC Solar Freedom, Inc.

CHRISTINA W. LOVATO,

Plaintiff,

v.

KING SOLARMAN, INC., CHIANG LIAN
CUNG a/k/a MICHAEL CUNG, KING
SOLARMAN (INDION) FUND I, LLC, AND
KING SOLARMAN (INDION) FUND II,
LLC,

Defendant.

Adversary No.: 21-05028-gs

**RE-NOTICE OF TAKING RULE 7030
VIDEOTAPED DEPOSITION OF KING
SOLARMAN, INC.**

NOTICE IS HEREBY GIVEN that Meland Budwick, P.A., attorneys for Christina Lovato, the duly appointed and acting chapter 7 trustee (“*Trustee*”), pursuant to *Fed. R. Civ. P.* 30(b)(6) and *Fed. R. Bankr. P.* 7030 and Local Rule 7030-2, will take the deposition of the person(s) designated by King Solarman, Inc., concerning the topics on the attached “**Exhibit 1**”

via videoconference, under oath at the date, time, and place set forth below:

EXAMINEE	LOCATION	DATE AND TIME
Person(s) designated by King Solarman, Inc.	Veritext Legal Solutions (Veritext Zoom Videoconference) Meeting ID# and password will be provided by Veritext prior to the examination	Thursday, March 23, 2023 at 9:00 a.m. PT

This deposition is being conducted pursuant to *Fed. R. Civ. P.* 30(b)(6), made applicable to this adversary proceeding by *Fed. R. Bankr. P.* 7030, and Local Rule 7030-2, and will be taken before a certified court reporter or some other notary public or officer authorized to record the testimony and will be videotaped. If the deponent requires an interpreter, it is deponent's responsibility to engage the employment of such interpreter to be present at the deposition. The deposition is being taken for the purpose of discovery, for use at trial, or both of the foregoing, or for such other purposes as are permitted under the Federal Rules of Bankruptcy Procedure and other applicable law, and shall continue from day to day, on dates mutually convenient, until completed. The scope of the deposition shall be as described in *Fed. R. Civ. P.* 26(b).

NOTICE IS FURTHER GIVEN that we reserve the right to conduct this deposition virtually, utilizing the secure web-based deposition option afforded by Veritext or in the alternative video teleconferencing (VTC) services offered by Veritext ("Web Deposition") or telephonically only to provide remote access for those parties wishing to observe the deposition via the internet and/or telephone. Also take notice that, the court reporter may also be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponent. In addition, we also reserve the right to utilize instant visual display technology such that the court reporter's writing of the proceeding will be displayed simultaneous to their writing of same on one's laptop, iPad, tablet or other type of display device connected to the court reporter.

Dated: February 28, 2023.

/s/ Alexander E. Brody
Alexander E. Brody, Esq.
Attorney for Christina Lovato, Trustee

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2023, I caused to be served the following document (s):

**RE- NOTICE OF TAKING RULE 7030 VIDEOTAPED
DEPOSITION OF KING SOLARMAN, INC.**

I caused to be served the above -named document(s) as indicated below:

✓ a. Via ECF to:

(The following is the list of parties who are currently on the list to receive email notice/service for this case.)

ALEXANDER E. BRODY abrody@melandbudwick.com
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✓ b. Via Electronic Mail to:

KATHRYN S. DIEMER kdiemer@diemerwei.com

MICHAEL B. NISHIYAMA mikenishiyamaSF@gmail.com

DATED: February 28, 2023.

/s/ Alexander E. Brody

Alexander E. Brody, Esq.

EXHIBIT 1

TOPICS

(all capitalized terms are defined below)

1. Your relationship with DC Solar.
2. Your vendor relationship with DC Solar.
3. Your relationship with Jeff Carpoff.
4. Your relationship with Michael Cung.
5. Your business relationship, including transactions, with J&C Consulting, Inc.
6. Payments from DC Solar to King Solarman from CY 2014 – CY 2018.
7. Payments from King Solarman to J&C Consulting, Inc. related to the payments in topic number 6 above.
8. Agreements between Jeff Carpoff (including any entity he is affiliated with) and Michael Cung (including any entity he is affiliated with).
9. Your business relationship, including transactions, with Hansen Management & Consulting, LLC.
10. Your relationship with Alan Hansen.
11. Any work performed for You by Vincent Chong.
12. Your business relationship, including transactions, with Efficient Energy Distribution, Inc.
13. Your business relationship, including transactions, with YT International.

Definitions

1
2 1. All references to any Person (as defined below) shall have the broadest possible
3 interpretation, including all persons and entities, and includes his/her/its employees, agents,
4 servants, subsidiaries, parent company, affiliated company and any other person or entity or
5 Representative (as defined below) acting or purporting to act on behalf or under his/her control.

6 2. All references to the singular include the plural, and vice versa.

7 3. The connectives “**and**” and “**or**” shall be construed either disjunctively or
8 conjunctively as necessary to bring within the scope of the discovery request all responses that
9 might otherwise be construed to be outside of its scope.

10 4. “**DC Solar**” shall mean DC Solar Solutions, Inc. (“**DCSS**”), DC Solar
11 Distribution, Inc. (“**DCSD**”), DC Solar Freedom, Inc. (“**DCSF**”) and Double Jump, Inc. (“**DJ**”).

12 5. “**Including**” means including but not limited to.

13 6. “**Related to**,” in any tense or for any derivation thereof, means tending to be
14 association with either in logic or reason, should be interpreted as broadly as possible, and
15 includes but is not limited to (in any tense or derivation) pertaining, referencing, regarding,
16 concerning, describing, mentioning, constituting, concerning, supporting, corroborating,
17 demonstrating, proving, evidencing, showing, refuting, disputing, rebutting, controverts or
18 contradicts.

19 7. “**Representative**” means any and all agents, employees, servants, officers,
20 directors, attorneys, or other persons acting or purporting to act on behalf of the Person
21 in question.

22 8. “**You**” or “**Your**” or “**King Solarman**” refers to King Solarman, Inc., including its
23 employees, agents, contractors, subsidiaries, parent company, affiliated companies, and other
24 persons acting or purporting to act on Your behalf, including Your Representative.